

PETER OBSTLER (*admitted pro hac vice*) – [pobstler@omm.com](mailto:pobstler@omm.com)  
NORA M. PUCKETT (*admitted pro hac vice*) – [npuckett@omm.com](mailto:npuckett@omm.com)  
DAVID S. ALMELING (*admitted pro hac vice*) – [dalmeling@omm.com](mailto:dalmeling@omm.com)  
O'MELVENY & MYERS LLP  
Embarcadero Center West  
275 Battery Street  
San Francisco, California 94111-3305  
Telephone: (415) 984-8700  
Facsimile: (415) 984-8701

LEE BERKELEY ROWLAND – leerowland@earthlink.net  
AMERICAN CIVIL LIBERTIES UNION OF NEVADA  
1280 Terminal Way, Ste. 46  
Reno, Nevada 89502  
Telephone: (775) 786-1033  
Facsimile: (775) 786-0805

Attorneys for Plaintiff  
**JANA ELHIFNY**

C. ROBERT COX, NSB #1780  
MICHAEL E. MALLOY, NSB #617  
CHRISTOPHER D. JAIME, NSB #4640  
MAUPIN, COX & LeGOY  
4785 Caughlin Parkway  
P.O. Box 30,000  
Reno, Nevada 89520  
Telephone: (775) 827-2000  
Facsimile: (775) 827-2185

## Attorneys for all Defendants

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JANA ELHIFNY, individually,

Case No. 3:04-CV-00583-LRH-PAL

**Plaintiff,**

**STIPULATION AND  
[PROPOSED] ORDER  
REGARDING DISCOVERY**

V.

CINDA GIFFORD, et. al.

#### Defendants.

1           WHEREAS, under the Court's Order dated July 11, 2007 (Dkt. # 137), "Discovery shall  
2 be extended and shall be completed by May 30, 2008";

3           WHEREAS, under the Court's Order dated March 7, 2008 (Dkt. # 174), "Disclosures  
4 concerning experts shall be made on April 2, 2008," and "Disclosures respecting rebuttal reports  
5 shall be made within 30 days after the initial disclosure of experts";

6           WHEREAS, although the Parties have served and exchanged written discovery and have  
7 taken numerous fact depositions, they anticipate they will need additional time to complete all  
8 discovery based on the current deadlines; and

9           WHEREAS, the parties do not anticipate the stipulated extensions of time will otherwise  
10 affect the case schedule, especially in light of the parties' interlocutory appeal, which is currently  
11 pending before the United States Court of Appeals for the Ninth Circuit.

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 IT IS HEREBY STIPULATED THAT:

2 (1) Disclosures concerning experts shall be made on May 2, 2008.

3 (2) Disclosures respecting rebuttal experts shall be made within 30 days after the initial  
4 disclosure of experts.

5 (3) Last date to complete discovery shall be June 30, 2008.

6 IT IS SO STIPULATED.

7 Dated: March 31, 2008

O'MELVENY & MYERS LLP

9 By: /s/ David S. Almeling

10 David S. Almeling  
Attorneys for Plaintiff JANA ELHIFNY

11 Dated: March 31, 2008

MAUPIN, COX & LeGOY

13 By: /s/ Christopher D. Jaime

14 Christopher D. Jaime  
15 Attorneys for Defendants, CINDA GIFFORD,  
*et al.*

16 IT IS SO ORDERED:



20 SF1:710534.1  
21 LARRY R. HICKS  
22 UNITED STATES DISTRICT JUDGE

23  
24  
25  
26  
27  
28 DATED: April 10, 2008